

**Sealed**

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UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS  
FILED

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS  
BROWNSVILLE DIVISION

JAN 18 2022

NATHAN OCHSNER  
CLERK OF COURT

UNITED STATES OF AMERICA

§

vs.

§

CRIMINAL NO. B-21-392-S3

JOSE ROBERTO MOLINA-MEDRANO

§

OSIEL CARDENAS-SALINAS JR.

AZHUAN MARTINEZ

§

**SEALED  
SUPERSEDING  
INDICTMENT**

THE GRAND JURY CHARGES:

**COUNT 1**

On or about April 22, 2021, in the Southern District of Texas, Defendant,

**JOSE ROBERTO MOLINA-MEDRANO,**

an alien previously denied admission, excluded, deported, and removed, was unlawfully present in the United States having been found in Cameron County, Texas, without having obtained consent to reapply for admission into the United States from the Attorney General of the United States and Secretary of Homeland Security.

In violation of Title 8, United States Code, Section 1326(a) and (b)(1).

**COUNT 2**

On or about April 22, 2021 in the Southern District of Texas and within the jurisdiction of the Court, Defendant,

**JOSE ROBERTO MOLINA-MEDRANO,**

an alien illegally in the United States, did knowingly possess in and affecting commerce a firearm, namely, a Bushmaster, model XM15-ES2, .223-5.56 caliber rifle, serial number L353568.

In violation of Title 18, United States Code, Sections 922(g)(5) and 2.

### **COUNT THREE**

On or about April 22, 2021 in the Southern District of Texas and within the jurisdiction of the Court, Defendant,

**JOSE ROBERTO MOLINA-MEDRANO,**

having been convicted on August 28, 2018, in the United States District Court, Southern District of Texas, Brownsville Division, in Cause No. B-18-CR-157, of the felony offense of Illegal Reentry by a Previously Deported Alien after a felony conviction, a crime punishable by imprisonment for a term exceeding one year, did knowingly possess in and affecting interstate commerce a firearm, namely, a Bushmaster, model XM15-32, .223-5.56 caliber rifle, serial number L353568.

In violation of Title 18, United States Code, Section 922(g)(1) and 2.

### **COUNT FOUR**

On or about April 22, 2021, in the Southern District of Texas and within the jurisdiction of the Court, Defendants,

**JOSE ROBERTO MOLINA MEDRANO,**

**OSIEL CARDENAS-SALINAS, JR.,**

**and**

**AZHUAN MARTINEZ,**

knowingly attempted to export and export from the United States to the Republic of Mexico, any merchandise, articles and objects, specifically: five (5) Bushmaster rifles XM15-E2S, caliber .223-5.56 and five (5) Zastava rifles, model M90, caliber 7.62x39, contrary to law and regulation of the United States, to wit: Title 22, United States Code, Section 2778.

In violation of Title 18, United States Code, Section 554(a) and Title 18, United States Code, Section 2.

**COUNT FIVE**

On or about April 22, 2021 in the Southern District of Texas and within the jurisdiction of the Court, Defendants,

**JOSE ROBERTO MOLINA MEDRANO,  
OSIEL CARDENAS-SALINAS JR.,  
and  
AZHUAN MARTINEZ,**

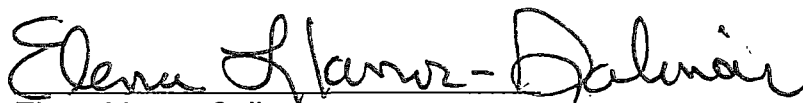
received, concealed, bought, and facilitated the transportation, concealment, and sale of certain merchandise, articles and objects, specifically: five (5) Bushmaster rifles XM15-E2S, caliber .223-5.56 and five (5) Zastava rifles, model M90, caliber 7.62x39, prior to exportation, knowing them to be intended for exportation contrary to law and regulation of the United States, to wit: Title 22, United States Code, Sections 2778 (b)(2).

In violation of Title 18, United States Code, Section 554(a) and Title 18, United States Code, Section 2.

A TRUE BILL:

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FOREPERSON OF THE GRAND JURY

JENNIFER B. LOWERY  
UNITED STATES ATTORNEY

A handwritten signature in black ink, appearing to read 'Elena Llanos-Salinas', written over a horizontal line.

Elena Llanos-Salinas  
Assistant United States Attorney